



Natural Gas Pipeline Company of America

A MIDCON CORP. COMPANY

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RSPA -98-4868-30

Dockets Unit, Room 8417
Office of Pipeline Safety
Research and Special Projects Administration
U. S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

November 21, 1991

RE: Gas Gathering Line Definition
NOPR: Docket-E-122, Notice 1 (AB 15)

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Dear Ladies and Gentlemen:

Natural Gas Pipeline Company of America ("Natural") files this letter in response to the above referenced notice of proposed rulemaking ("NOPR") which appeared in the Federal Register of September 25, 1991. Natural owns and operates some 3,000 miles of rural gathering pipeline and 12,600 miles of onshore interstate pipeline. The pipelines link key Gulf Coast and Southwest natural gas producing areas with major Midwest markets. Natural also has interest in other pipeline systems which extend into the Gulf of Mexico and the Rocky Mountains.

Natural does not support the NOPR for the key reasons stated by the American Gas Association and the Interstate Natural Gas Association of America in their filings on the NOPR:

It does not increase public safety.

It erroneously mixes the Federal Energy Regulatory Commission's promotion of economic efficiency with RSPA's promotion of public safety.

It will generate costs that far outweigh the perceived benefits.

Concerning the NOPR's specific questions, about 200 miles of Natural's rural gathering pipeline could be affected if the NOPR, in its present form, is adopted as a final rule. Using industry averages, capital costs for the conversion of such pipe under the NOPR are estimated to be \$4 million. Likewise, annual operating and maintenance costs are estimated to be \$100,000. Since the affected pipelines are in truly rural country with very little public interface, the expenditures would not increase public safety.

Sincerely,

F. Roy Fleet
Pipeline Safety & Research